

Message

From: Matichuk, Rebecca [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=16F8C962B98F4DE08E63D15CC4BD1B26-MATICHUK, REBECCA]
Sent: 7/31/2019 8:47:29 PM
To: Tillerson, Clint [Tillerson.Clint@epa.gov]
CC: Thurman, James [Thurman.James@epa.gov]
Subject: RE: SO2 Annual Verification Report

Thanks so much Clint!

I'm still working with Adam on where we continue to have issues or where we will need your assistance. Adam or myself will follow-up with you when we need additional help.

Thanks,
Rebecca
303-312-6867

From: Tillerson, Clint <Tillerson.Clint@epa.gov>
Sent: Wednesday, July 31, 2019 11:40 AM
To: Matichuk, Rebecca <Matichuk.Rebecca@epa.gov>
Cc: Thurman, James <Thurman.James@epa.gov>
Subject: RE: SO2 Annual Verification Report

Hi Rebecca,

I'll start with #2 first since I now have confirmation on that one.

#2 - I emailed Andrea Carrillo (OGC) and asked for confirmation on my understanding of section 1205(c) in the DRR regarding ongoing verification requirements for an area designated attainment that chose the modeling pathway and modeled using allowable emissions. Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Andrea's reply:

"Thanks for reaching out, Clint. Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Thanks!
Clint

From: Matichuk, Rebecca <Matichuk.Rebecca@epa.gov>
Sent: Tuesday, July 30, 2019 6:22 PM
To: Tillerson, Clint <Tillerson.Clint@epa.gov>
Cc: Thurman, James <Thurman.James@epa.gov>
Subject: RE: SO2 Annual Verification Report

Hi Clint,

I think my first set of follow-up questions are noted below. One is a new question and the other is just a reminder. I'll let you know if more come up after my meeting with the Permit Lead. Thanks so much for your help!!

Ex. 5 Deliberative Process (DP)

Thanks,
Rebecca
303-312-6867

From: Tillerson, Clint <Tillerson.Clint@epa.gov>
Sent: Tuesday, July 30, 2019 9:57 AM
To: Matichuk, Rebecca <Matichuk.Rebecca@epa.gov>
Cc: Thurman, James <Thurman.James@epa.gov>
Subject: RE: SO2 Annual Verification Report

Hi Rebecca,

I think I have a good understanding of the issues. Here are some general comments. I have also commented on each of your specific questions below in blue and put comments in your Word doc, attached. Many of the responses are similar in all 3 places. (Also attaching the ND report for James' benefit, if he is curious or interested.)

After you have a chance to read through them, let me know if you would like to talk later this afternoon. I will be out from around 1:15-3:15, Eastern.

General comments:

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

From: Matichuk, Rebecca <Matichuk.Rebecca@epa.gov>

Sent: Monday, July 29, 2019 12:01 PM

To: Tillerson, Clint <Tillerson.Clint@epa.gov>

Subject: SO2 Annual Verification Report

Importance: High

Hi Clint,

I have attached two documents for review. The document that has the Wednesday deadline is titled "NorthDakotaDDRRReport2019LH - For public comment + RIM notes.pdf" The high-lighted text notes where I have questions and includes a comment bubble. I also outlined the questions below. As mentioned, I didn't want to take text out of context so my recommendation would be to review in pdf, but my specific questions and your responses may be easier to work with below instead of in pdf....your preference. If possible, I would appreciate your feedback on my questions below/in the bubbles. Please note that my comment bubble in Table 1 is associated with the "Model Design Value" column and not the rows that are high-lighted. The rows were high-lighted by the State.

The second document titled "R8_DRR_Verifications_Terminations_Outline_07292019.docx" is what I'm working on for our management briefing and a potential approach for the level of analysis needed for the Annual Verification Reports and Termination Requests. Again, this is very preliminary and I would appreciate any feedback relating to the content and questions in the comment bubbles. Might be easier to respond within the WORD document.

My schedule is completely open today and I have a lot of time tomorrow if you'd like to discuss any of the questions or documents in more detail.

Thanks so much for you help! My apologies for the extremely short timeframe.

Rebecca

QUESTIONS

1. Page 1, Paragraph 2: "Because of its proximity to LOS and CCS, the DRR source Stanton Station was also included in the same modeling analysis as a nearby source. ...The Antelope Valley Station (AVS) and the Great Plains Synfuels Plant were modeled together with the Coyote Station."

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2. Page 2, Paragraph 1: "According to the ORR (80 FR 51088), if an SO₂ source used allowable emissions in modeling to successfully demonstrate compliance with the SO₂ NAAQS, then the State is not required to submit future annual reports for that source."

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3. Page 2, Paragraph 4: "Based on 40 CFR 51.1205(c), LOS does not need to be addressed in these future emissions tracking reports for the ORR, because of Basin Electric's use of allowable emissions for their sources in their modeling analyses."

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4. Page 4, Paragraph 1: "If the most recent year's annual emissions are lower than what was modeled, then the source's concentrations should still comply with the 1-hour SO₂ NAAQS." See general comments #5 and #6 above.

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6. Page 4, Paragraph 4: "The North Dakota Department of Environmental Quality (NDDEQ) accessed the CAM AMPD database and evaluated the data for annual SO₂ emissions."

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7. Page 6, Paragraph 1: "As seen in Table 1, there is a 24% increase in emissions at Coyote in 2018 compared to the average of the years modeled (2012-2014)...The maximum concentration (i.e., design value) in the vicinity of Coyote, based on the modeling that was approved by EPA, is 115 µg/m³...which is only about 59% of the NAAQS."

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8. Table 1. Model Design Values.

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